



**FINAL ADMINISTRATIVE DECISION  
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: B & J Patel  
DOCKET NO.: 23-23341.001-R-1  
PARCEL NO.: 07-23-204-005-0000

The parties of record before the Property Tax Appeal Board are B & J Patel, the appellants, by Brian P. Liston, attorney-at-law of the Law Offices of Liston & Tsantilis, P.C. in Chicago, and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **No Change** in the assessment of the property as established by the **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$19,397  
**IMPR.:** \$43,202  
**TOTAL:** \$62,599

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellants timely filed the appeal from a decision of the Cook County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2023 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

**Findings of Fact**

The subject property is improved with a two-story dwelling of frame construction containing 2,996 square feet of living area. The dwelling is approximately 28 years old. Features of the home include a full basement, central air conditioning, one fireplace, 2½ bathrooms, and a 3-car garage. The property has a 13,855 square foot site located in Schaumburg, Schaumburg Township, Cook County. The subject is classified as a class 2-78 property under the Cook County Real Property Assessment Classification Ordinance.

The appellants contend inequity regarding the improvement assessment as the basis of the appeal. In support of this argument the appellants submitted information on three equity comparables composed of class 2-78 properties improved with two-story dwellings of frame, masonry, or frame and masonry exterior construction that range in size from 2,774 to 3,455 square feet of living area. The homes range in age from 26 to 34 years old. Each property has a

full basement, central air conditioning, one fireplace, 2½ or 4 bathrooms, and a 3-car garage. The comparables have different assessment neighborhood codes than the subject property are located either .7 or .8 of a mile from the subject. Their improvement assessments range from \$30,902 to \$42,839 or from \$11.14 to \$13.82 per square foot of living area. The appellants requested the subject's improvement assessment be reduced to \$37,150.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$62,599. The subject property has an improvement assessment of \$43,202 or \$14.42 per square foot of living area. In support of its contention of the correct assessment the board of review submitted information on four equity comparables consisting of class 2-78 properties improved with two-story dwellings of frame exterior construction that range in size from 2,506 to 3,310 square feet of living area. The homes are 28 or 31 years old. Each property has a full or partial basement, central air conditioning, one fireplace, 2½ bathrooms, and a 2-car or 3-car garage. The comparables have the same assessment neighborhood code as the subject property and are located ¼ of a mile from the subject. Their improvement assessments range from \$39,654 to \$50,287 or from \$14.45 to \$15.82 per square foot of living area.

### **Conclusion of Law**

The appellants contend assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellants did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted information on seven equity comparables with the same classification code as the subject property to support their respective positions. The Board finds the best evidence of assessment equity to be board of review comparables #2, #3 and #4 that are most similar to the subject property in location and dwelling size. These properties have the same assessment neighborhood code as the subject property, are located ¼ of a mile from the subject property and are improved with dwellings that range in size from 2,865 to 3,310 square feet of living area. The homes have relatively similar features as the subject with the primary exception being each has a smaller garage than the subject suggesting each would require an upward adjustment to make them more equivalent to the subject property for this difference. These three comparables have improvement assessments that range from \$43,056 to \$50,287 or from \$14.45 to \$15.68 per square foot of living area. The subject's improvement assessment of \$43,202 or \$14.42 per square foot of living area falls within the range of the total improvement assessments but is below the range on a per square foot of living area basis as established by the best comparables in this record. Less weight is given the appellants' comparables and board of review comparable #1 due to differences from the subject property in location and/or dwelling size. Based on this record the Board finds the appellants did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not justified.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member



Member

DISSENTING: \_\_\_\_\_

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: February 17, 2026



Clerk of the Property Tax Appeal Board

**IMPORTANT NOTICE**

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

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